

## EXHIBIT O

## Kara Wolke

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**From:** Witty, Cayla <Cayla.Witty@lewisbrisbois.com>  
**Sent:** Tuesday, September 09, 2014 9:49 AM  
**To:** J Tostrud; Foley, Margaret  
**Cc:** Freeman, Robert; Anthony Carter; Kara Wolke; David O'Mara, Esq.; Marc L. Godino; Doug Forrest; Bruce Pixley (bruce@pixleyforensics.com)  
**Subject:** RE: UMC -- Special Master Order dated 8-11-14

Counsel Tostrud,

UMC is working with all due diligence to accomplish production of any relevant information from the databases identified by both parties and the database application systems GRASP, Clarity, Teletracking, and CrimeStar. Unfortunately, the Special Master's deadlines were arbitrary and unrealistic to accomplish these productions. UMC looks forward to continuing to work with Plaintiffs and their ESI consultants to coordinate production in an efficient and effective manner in accordance with the Second Amended ESI Protocol Order.

If you have any specific concerns, please do not hesitate to contact me. I am available at most any time this week to talk.

Cayla\*



### Cayla Witty

#### Attorney

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**From:** Jon Tostrud [mailto:jtostrud@tostrudlaw.com]  
**Sent:** Monday, September 08, 2014 10:55 AM  
**To:** Witty, Cayla; Foley, Margaret  
**Cc:** Freeman, Robert; Anthony Carter; Kara Wolke; David O'Mara, Esq.; Marc L. Godino, Esq.; Jon Tostrud; Doug Forrest; Bruce Pixley (bruce@pixleyforensics.com)  
**Subject:** UMC -- Special Master Order dated 8-11-14

Counsel Foley and Counsel Witty:

Special Master Garrie's order (Dkt. 185) dated August 11, 2014 and filed August 13, 2014 identified several deadlines for compliance. Would you please provide confirmation that UMC has not produced the information in accordance with the dates set out by this Order?

As a reminder, UMC was ordered to:

1. No later than August 29, 2014, collect, search and produce all responsive ESI contained in all databases identified by Plaintiffs and UMC;
2. On or before September 3, 2014, UMC is to produce all responsive ESI for each of the timekeeping systems to Plaintiffs in accordance with the ESI Protocol.

Plaintiffs request a response from UMC no later than Tuesday (tomorrow) morning at 10am.

Sincerely,  
Counsel Tostrud

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